

**Request for Extension of Compliance**  
**40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants**  
**Brick and Structural Clay Products Manufacturing Source Category**

**I. General Information**

**A. Facility Information**

Richards Brick Company  
234 Springer Ave.  
Edwardsville, IL 62025  
618-656-0230

Operating Permit Number

Facility I.D. Number

119803AAB

Responsible Official's Name/Title  
Mike Semanisin - Vice President

**B. Indicate the relevant standard or requirement for which you request a compliance extension:**

Title 40, Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing).

**II. Timeliness of Request**

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date (unless the elements are met for an alternative submittal date, as outlined in 40 C.F.R. § 63.6(i)). This request:

- ☒ (1) is being submitted on or before August 28, 2018 (120 days before the compliance deadline of December 26, 2018); or
- ☐ (2) is being submitted after August 28, 2018 but before December 26, 2018, because the need for the compliance extension arose after August 28, 2018, and the need arose due to circumstances beyond reasonable control of the owner or operator. An addendum may be included to explain the reasons for the delay in submittal.

*Note: A nonfrivolous request under (1) will stay the applicability of the rule as to the emission points in question until the request is granted or denied. A denial will be effective as of the date of denial or the original compliance date, whichever is later. A nonfrivolous request under (2) will stay the applicability of the rule as to the emission points in question until such time as the request is granted or denied.*

**III. Eligibility**

Are you eligible to apply for a compliance extension because you are unable to comply with the relevant standard by December 26, 2018 and need additional time for installation of controls (which includes time to achieve area source status)? 40 C.F.R. § 63.6(i)(4)(i)(A).

☒ Yes      ☐ No

The statutory authority for compliance extensions under Clean Air Act Section 112(i) includes adopting controls or limits necessary to qualify as a “synthetic minor” or “area” source.

#### IV. Compliance Schedule Information

- A. Select the applicable approach described below (Option 1 or 2) that will be taken by your facility to achieve compliance within one year of the compliance date for the relevant standard (including, if applicable, actions necessary for your facility to qualify as a synthetic area source). 40 C.F.R. § 63.6(i)(6)(i)(A). At your option, you may provide additional detail in an attachment to this form.

☐ **OPTION 1:** This facility intends to install controls to reduce emissions to the level of the applicable standard and will be applying for a state minor NSR construction permit, if required by the state regulations, to install the controls. If your compliance approach involves installing physical controls, undertaking material substitution, or some other method, you may wish to describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as if EPA revises the NESHAP such that compliance can be achieved by the facility without the need to install controls.

☒ **OPTION 2:** This facility needs additional time to become an area source. This facility has submitted or will submit a permit application seeking an area source level emission limit, such that it will not be subject to the NESHAP. If you are installing physical controls, undertaking material substitution, or restricting operations to become an area source, you may describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as a request to eliminate any such limitation that has been issued if EPA revises the NESHAP such that compliance can be achieved by the facility without the need for an area source permit.

B. Describe your compliance schedule. 40 C.F.R. § 63.6(i)(6)(i)(B)(1)-(2).

1. My facility has submitted an initial application for required permits on March 20, 2017

☒ Yes      ☐ No

2. If compliance is to be achieved through a means other than becoming an area source, the facility will begin on-site construction, installation of emission control equipment, or initiate a process change within 30 days of obtaining any required permits for such action. 40 C.F.R. § 63.6(i)(6)(i)(B)(1). *If no permits are required for such action*, the facility will initiate the activities as applicable by the dates specified below:

☐ On-site construction      Date:

☐ Installation of controls      Date:

☐ Process change

Date: Click here to enter text.

☐ Application for \_\_\_\_\_

Date: Click here to enter text.

Comments

3. Any restriction on emissions, on-site construction, installation of emission control equipment, or a process change will be completed by December 26, 2019. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).

Comments

4. Specify the date by which final compliance is to be achieved. 40 C.F.R. § 63.6(i)(6)(i)(B)(2).

Date: \_\_\_\_.

Comments:

- C. You may provide additional information regarding your method of achieving compliance in an attachment to provide a fuller description of your control strategy than outlined above, as appropriate.**

Please see enclosed letter sent with original application to "Illinois Environmental Protection Agency" dated March 20, 2017

## V. Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this request is true, accurate, and complete.

Name of Responsible Official (Print or Type)                      Title  
Mike Semanisin    Vice President

Date

8/22/2018

Signature of Responsible Official



Submittal Instructions: Submit your completed form, and any addenda, to:

U.S. Environmental Protection Agency  
Attention:     Mr. Brian Storey  
Sector Policies and Programs Division  
Office of Air Quality Planning and Standards  
109 T.W. Alexander Drive , Mail Code: D243-04  
Research Triangle Park, NC 27709

You may also wish to send a copy of this submittal to your state or local permitting authority. Be sure that the submittal is made by August 28, 2018 and that you retain proof of the date of submittal for your records.





# **Richards Brick Company**

MANUFACTURERS AND DISTRIBUTORS

234 SPRINGER AVENUE  
EDWARDSVILLE, IL 62025

TELEPHONE: (618) 656-0230  
FAX: (618) 656-0944

March 20, 2017

Re: FESOP Application  
Ray Pilapil  
Illinois Environmental Protection Agency – Bureau of Air  
Permit Section  
PO Box 19506  
Springfield, IL 62794

Mr. Pilapil,

Enclosed is our initial FESOP application for our operating our Tunnel Kiln.  
Richards Brick is a clay brick manufacturer. We use a tunnel kiln to fire the brick to maturity.  
We have included all of the requested information from David Taylor including our letter  
proposing to limit our production to allow us to fall below the applicable levels of the CAAPP  
permit

Thank You,

Mike Semanisin